

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

APPLETON PAPERS INC. and)	
NCR CORPORATION,)	
)	
Plaintiffs,)	
v.)	No. 08-CV-16-WCG
)	
GEORGE A. WHITING PAPER COMPANY,)	
ET AL.,)	
Defendants.)	

NCR CORPORATION,)	
)	
Plaintiff,)	
v.)	No. 08-CV-0895-WCG
)	
KIMBERLY-CLARK CORPORATION,)	
ET AL.,)	
Defendants.)	

**NOTICE OF WITHDRAWAL WITHOUT PREJUDICE OF PLAINTIFF NCR
CORPORATION’S CIVIL L.R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION TO
COMPEL DIRECTED TO GEORGIA-PACIFIC CONSUMER PRODUCTS LP (F/K/A
FORT JAMES OPERATING COMPANY), FORT JAMES CORPORATION AND
GEORGIA-PACIFIC LLC**

Plaintiff, NCR Corporation (“NCR”), by and through its undersigned counsel, hereby withdraws, without prejudice, its Civil Local Rule 7(h) Expedited Non-Dispositive Motion to compel Georgia-Pacific Consumer Products LP (f/k/a Fort James Operating Company), Fort James Corporation, and Georgia-Pacific LLC (collectively, “GP”) to produce certain insurance settlement agreements (“Motion to Compel”, Dkt. 1116).

The Motion to Compel is no longer required because GP and NCR (and GP’s relevant insurance carriers) have reached an agreement under which NCR would receive GP’s insurance settlement agreements. The agreement, however, is contingent on entry of a Stipulated

Protective Order. Concurrent with the filing of the Motion to Compel, NCR also filed a Non-Dispositive Expedited Motion for Entry of a Stipulated Protective Order (Dkt. 1117). Entry of the Stipulated Protective Order is still necessary for the reasons stated in that motion, and is also necessary to the agreement reached concerning production of GP's insurance settlement agreements. NCR is therefore not withdrawing that motion.

NCR reserves its rights to re-file the Motion to Compel should it become necessary.

Respectfully submitted,

NCR CORPORATION

/s/ Kathleen L. Roach

Dated: April 21, 2011

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2011, I electronically filed the foregoing using the ECF system, which will send notification of such filing to: Philip Munroe at DiRenzo & Bomier LLC, pmunroe@direnzollc.com; Scott Fleming at Weiss Berzowski Brady LLP, sbf@wbb-law.com; David Mandelbaum at Greenberg Traurig, LLP, mandelbaumd@gtlaw.com; Marc Davies at Greenberg Traurig, LLP, daviesm@gtlaw.com; Sabrina Mizrachi at Greenberg Traurig, LLP, mizrachis@gtlaw.com; Monique Mooney at Greenberg Traurig, LLP, mooneym@gtlaw.com; Caleb Holmes at Greenberg Traurig, LLP, holmescc@gtlaw.com; Patrick Zaepfel at Kegel Kelin Almy & Grimm, LLP, zaepfel@kkaglaw.com; Philip Hunsucker at Hunsucker Goodstein & Nelson PC, phunsucker@hgnlaw.com; David Rabbino at Hunsucker Goodstein & Nelson PC, drabbino@hgnlaw.com; Christopher Dow at Hunsucker Goodstein & Nelson PC, cdow@hgnlaw.com; Allison McAdam at Hunsucker Goodstein & Nelson PC, amcadam@hgnlaw.com; Eric Mroz at Hunsucker Goodstein & Nelson, P.C., mroz@hgnlaw.com; David Edquist at von Briesen & Roper, s.c., dedquist@vonbriesen.com; Christopher Riordan at von Briesen & Roper, s.c., criordan@vonbriesen.com; Patrick Wells at von Briesen & Roper, s.c., pwells@vonbriesen.com; Russell Wilson at Ruder Ware, rwilson@ruderware.com; Linda Benfield at Foley & Lardner LLP, lbenfield@foley.com; Sarah Slack at Foley & Lardner LLP, sslack@foley.com; Charles Gering at Foley & Lardner LLP, cgering@foley.com; Paul Bargren at Foley & Lardner LLP, pbargren@foley.com; Michelle Gale at Dykema Gossett PLLC, mgale@dykema.com; Joseph Basta at Dykema Gossett PLLC, jbasta@dykema.com; Daniel Murray at Johnson & Bell, Ltd., murrayd@jbltd.com; Garrett Boehm, Jr. at Johnson & Bell, Ltd., boehmg@jbltd.com; Frederick Mueller at Johnson & Bell, Ltd., muellerf@jbltd.com; John Cermak, Jr. at Baker & Hostetler LLP, jcermak@bakerlaw.com; Sonja Inglin at Baker & Hostetler LLP, singlin@bakerlaw.com; Timothy Anderson at Remley & Sensenbrenner, S.C.,

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I also hereby certify that on April 15, 2011, I caused a copy of the foregoing to be sent via electronic mail to the following counsel:

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